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FILED
DISTRICT COURT OF GUAM

MAR 05 2008

JEANNE G. QUINATA
Clerk of Court

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ERNESTO PAGLICAWAN VERDERA and
MARK ANTHONY BARTOLOME,

Defendants.

CRIMINAL CASE NO. 08-00018

INDICTMENT

**BULK CASH SMUGGLING
OUT OF THE UNITED STATES**
[31 U.S.C. § 5332]
(Count I)

FORFEITURE ALLEGATION
[31 U.S.C. § 5332(b)(2)]
(Count II)

THE GRAND JURY CHARGES:

COUNT I - BULK CASH SMUGGLING OUT OF THE UNITED STATES

On or about February 28, 2008, in the District of Guam, the defendants herein,
ERNESTO PAGLICAWAN VERDERA and MARK ANTHONY BARTOLOME, did
unlawfully, willfully and knowingly, with the intent to evade a currency reporting requirement
under Title 31, United States Code, Section 5316, conceal more than \$10,000 in currency or
other monetary instruments in an article of luggage and other container, and did attempt to
transport said currency from a place within the United States, to a place outside the United
States, to-wit: \$810,631 in United States currency from Guam to the Philippines, the said
defendants knowing that they were required to file a report with the Secretary of the Treasury of

1 the amount of money they were attempting to transport, in violation of Title 18, United States
2 Code, Section 2 and Title 31, United States Code, Section 5332.

3 **COUNT II - FORFEITURE ALLEGATION**

4 The allegations of Count I are hereby realleged and incorporated by reference herein for
5 the purpose of alleging criminal forfeiture pursuant to Title 31, United States Code, Section
6 5332(b)(2), and Title 21, United States Code, Section 853.

7 From their engagement in the violation alleged in Count I of this Indictment, punishable
8 by imprisonment for more than one year, the defendants herein, ERNESTO PAGLICAWAN
9 VERDERA and MARK ANTHONY BARTOLOME, shall forfeit to the United States, pursuant
10 to Title 31, United States Code, Section 5332(b)(2) and Title 21, United States Code, Section
11 853, the personal property involved in the commission of said violation, to-wit: approximately
12 \$810,631 in United States currency, recovered on or about February 28, 2008, from the
13 defendant, all in violation of Title 31, United States Code, Section 5332(b)(2).

14 Dated this 5th day of March 2008.

15 A TRUE BILL.

16
17
18 **REDACTED**

19 LEONARDO M. RAPADAS
20 United States Attorney
21 Districts of Guam and NMI

22 By: 

23 KARON V. JOHNSON
24 Assistant U.S. Attorney

25 Reviewed:

26 By: 

27 JEFFREY J. STRAND
28 First Assistant U.S. Attorney